

***Remarks***

Reconsideration of this Application is respectfully requested. Upon entry of the foregoing Amendment to the Claims, claims 1-30 are pending in the application, of which claims 1, 12, 20, and 26 are independent. By the foregoing Amendment, claims 12, 15-18, 20 and 26-27 are sought to be amended. No new matter is embraced by this amendment and its entry is respectfully requested. Based on the above Amendment and the remarks set forth below, it is respectfully requested that the Examiner reconsider and withdraw all outstanding rejections.

***Rejection under 35 U.S.C. § 103***

The Examiner, on page 2 of the Office Action, has rejected claims 1-9 and 11-30 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,182,142 to Win *et al.* (hereinafter “Win”) in view of U.S. Patent No. 5,941,947 to Brown *et al.* (hereinafter “Brown”). Applicant respectfully traverses this rejection. Based on the remarks set forth below, Applicant respectfully requests that this rejection be reconsidered and withdrawn.

Regarding independent claim 1, the Examiner states that Win teaches Applicants’ elements of “receiving a resource request from a first requestor, the resource request including credentials and identifying an operation to be performed with respect to a resource” and “determining whether the first requestor is authorized to perform the operation with respect to the resource based on whether the credentials in the resource request match a resource authorization parameter associated with the resource node.” Applicant respectfully disagrees.

The present invention teaches a resource request that includes credentials and *identifies an operation to be performed with respect to the resource*. See Specification, page 2, lines 19-22; page 3, line 15 – page 4, line 2; page 8, line 23 – page 9, line 9. Contrary to the present invention, Win does not teach or suggest a resource request that *identifies an operation to be performed with respect to the resource*. Win also does not teach or suggest resource nodes. Since Win does not teach or suggest a resource request that identifies “an operation to be performed with respect to the resource” or “a resource node”, Win cannot teach Applicant’s element of “determining whether the first requestor is authorized to *perform the operation with respect to the resource* based on whether the credentials in the resource request match a resource authorization parameter associated with *the resource node*.”

The Examiner admits, on page 3 of the Office Action, that Win fails to teach Applicant’s elements of “mapping the resource request to a resource identifier” and “searching a resource data structure for a resource node based on the resource identifier.” The Examiner further states that Brown teaches these elements.

Applicant respectfully agrees that Win fails to teach Applicant’s elements of “mapping the resource request to a resource identifier” and “searching a resource data structure for a resource node based on the resource identifier.” Applicant respectfully disagrees that Brown solves the deficiencies of Win.

Brown does not solve the deficiencies of Win. Brown does not teach or suggest at least the following: that the resource request identifies “an operation to be performed with respect to a resource” or “determining whether the first requestor is authorized to perform the operation with respect to the resource based on whether the credentials in the

resource request match a resource authorization parameter associated with the resource node.”

Brown teaches that “access rights of users of a computer network with respect to data entities are specified by a relational database stored on one or more security servers. Application servers on the network that provide user access to the data entities generate queries to the relational database in order to obtain access rights lists of specific users.”

*Brown*, Abstract. Unlike the present invention, Brown does not teach “the resource request including credentials and identifying an operation to be performed with respect to a resource.” In fact, Brown appears to be silent on what the resource request includes or identifies. Also, contrary to the present invention, Brown does not appear to teach matching the credentials in the resource request with a resource authorization parameter associated with the resource node. Instead, Brown teaches that determining the user’s access rights with respect to the node includes reading a 32-bit security token associated with the node; generating a GetAccountRights call to the GetAccountRights API specifying as parameters of the call the node’s security token and the user’s 32-bit account number; and receiving from the GetAccountRights API either a 16-bit access rights value or a code indicating that the user is not authorized to access the node. *See Brown*, col. 15, lines 38-47.

Thus, for at least the above reasons, Applicants respectfully submit that claim 1, and the claims that depend therefrom (claims 2-11), are patentable over Win and Brown, separately or in combination.

Independent claims 12, 20, and 26 include similar elements to independent claim 1. Thus, for at least the reasons stated above, independent claims 12, 20, and 26, and the

claims that depend therefrom (claims 13-19, 21-25, and 27-30, respectively), are patentable over Win and Brown, separately or in combination.

Thus, neither Win nor Brown, separately or in combination, teach or suggest Applicants' claimed invention as recited in independent claims 1, 12, 20, and 26. For at least the reasons stated above, claims 1, 12, 20, and 26, and the claims that depend therefrom (claims 2-11, claims 13-19, 21-25, and claims 27-30, respectively), are patentable over the cited references. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1, 12, 20, and 26, and the claims that depend therefrom (claims 2-11, 13-19, 21-25, and 27-30, respectively).

The Examiner, on page 5 of the Office Action, has rejected claim 10 under U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,182,142 to Win in view of U.S. Patent No. 5,941,947 to Brown as applied to claim 9 and further in view of U.S. Patent No. 6,601,171 to Carter *et al.* Applicant respectfully disagrees. Claim 10 depends from independent claim 1 and is patentable over Win and Brown for at least the reasons stated above. Furthermore, Carter *et al.* does not teach or suggest the features missing from Win and Brown. Applicant therefore respectfully requests that the Examiner reconsider and withdraw the rejection of dependent claim 10.

**Conclusion**

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all currently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Response is respectfully requested.

Respectfully submitted,

Intel Corporation

*Crystal D. Sayles*

Crystal D. Sayles  
Senior Attorney  
Intel Americas, Inc.  
Registration No. 44,318  
(703) 633-6829

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c/o Blakely, Sokoloff, Taylor & Zafman, LLP  
12400 Wilshire Blvd.  
Seventh Floor  
Los Angeles, CA 90025-1026

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